

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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MALIBU MEDIA, LLC,	:
	:
Plaintiff,	:
	:
vs.	:
	:
JOHN DOE subscriber assigned IP address	:
108.30.247.86,	:
	:
Defendant.	:
-----X	

Case No. 1:14-cv-10155-KBF  
Judge Forrest

**DECLARATION OF JACQUELINE M. JAMES, ESQ.**

I, Jacqueline M. James, of full age, do hereby declare under penalty of perjury as follows:

1. I am attorney with The James Law Firm, PLLC, and I am an attorney at-law-of the state of New York and admitted before this Court. I am counsel of record for Plaintiff in the above-captioned matter. I make this declaration in support of Plaintiff's accompanying Motion for Sanctions.

2. Attached hereto as Exhibit A is a true and correct redacted copy of Patrick Paige's Expert Report.

3. Attached hereto as Exhibit B is a true and correct redacted copy of Defendant's deposition.

4. Attached hereto as Exhibit C is a true and correct redacted copy of Defendant's Response to Plaintiff's First Set of Interrogatories.

5. Attached hereto as Exhibit D is a true and correct redacted copy of Defendant's Response to Plaintiff's First Set of Interrogatories.

Dated: September 22, 2015

Respectfully submitted,

By: /s/ Jacqueline M. James  
Jacqueline M. James, Esq. (1845)  
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*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on September 22, 2015 I electronically filed the foregoing document with the Clerk of the Court using CM/ECF and that service was perfected on all counsel of record and interested parties through this system.

By: /s/ Jacqueline M. James